



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

AUG 25 2014

REPLY TO THE ATTENTION OF:

SC-5J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Halliburton Energy Services, Inc. c/o  
Todd D. Kantorczyk  
Manko Gold Katcher Fox LLP  
401 City Avenue, Suite 901  
Bala Cynwyd, PA 19004

Re: Request for Information Pursuant to Section 104(e) of CERCLA and Sections 308 and  
311 of CWA  
Statoil Eisenbarth Well Response Site  
Cleveland, Ohio  
Site Spill Identification Number: C53G

Dear Mr. Kantorczyk:

This letter seeks the cooperation of your client, Halliburton Energy Services, Inc. (Halliburton), in providing information and documents relating to the Statoil Eisenbarth Well Response Site (the Eisenbarth Well Pad Site).

On June 28, 2014, a fire, followed by several explosions, occurred at the Eisenbarth Well Pad, located at 42240 Long Ridge Road, Clarington, Ohio. EPA is responding to the release or threat of release of hazardous substances, pollutants or contaminants at the Eisenbarth Well Pad Site and the discharge of oil and/or potentially hazardous substances from the Eisenbarth Well Pad into or upon navigable waters of the United States that occurred as a result of that fire. This letter seeks your client's cooperation in providing information and documents relating to the generation, storage, treatment, transportation, disposal, and release of such substances at the Site.

In accordance with the Clean Water Act and other authorities, EPA has already undertaken certain actions and incurred certain costs in response to conditions at the Site. These response actions include:

1. Oversight of Response Actions
2. Collection of air, water, soil and sediment samples
3. Monitoring for public and worker safety

We encourage Halliburton to give this matter its immediate attention and request that it provide a complete and truthful response to this Information Request and enclosed questions (Enclosure B) within fourteen (14) calendar days of your receipt of this letter.

Under Section 104(e)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, (CERCLA), 42 U.S.C. § 9604(e)(2), EPA has broad information gathering authority which allows EPA to require persons to furnish information or documents relating to (a) the identification, nature and quantity of materials which have been or are generated, treated, stored or disposed of at a vessel or facility or transported to a vessel or facility; (b) the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility; and (c) information relating to the ability of a person to pay for or to perform a cleanup. EPA is also issuing this information request pursuant to the authority under Sections 308(a) and 311(m) of the Clean Water Act (CWA), 33 U.S.C. §§ 1318, 1321.

While EPA seeks Halliburton's cooperation in this investigation, compliance with the Information Request is required by law. In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information Halliburton provides may be used by EPA in administrative, civil or criminal proceedings. Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes EPA to pursue penalties for failure to comply with information requests or for failure to respond adequately to requests for submissions of required information. EPA has comparable authorities under the CWA.

Some of the information EPA is requesting may be considered by Halliburton to be confidential. Please be aware that Halliburton may not withhold the information upon that basis. If Halliburton wishes EPA to treat the information confidentially, Halliburton must advise EPA of that fact by following the procedures outlined in Enclosure A, including the requirement for supporting its claim for confidentiality.

If Halliburton has information about other parties who may have information that may assist the agency in its investigation of the Eisenbarth Well Pad Site or may be responsible for the contamination at the Eisenbarth Well Pad Site, that information should be submitted within the timeframe noted above.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. § 3501 *et seq.*

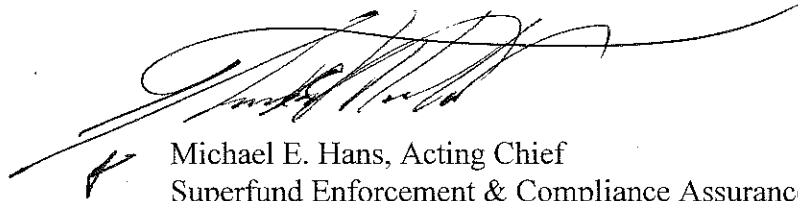
Instructions on how to respond to the questions in Enclosure B to this document are described in Enclosure A. The response to this Information Request should be mailed to:

Arlene Lilly, Enforcement Specialist  
U.S. Environmental Protection Agency, Region 5  
Superfund Division - Enforcement & Compliance Assurance Branch  
Enforcement Services Section 1, SE-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590


If you have additional questions about the Site or this information request, please contact Sheila McAnaney, Assistant Regional Counsel, at (312) 353-3114.

We appreciate and look forward to your prompt response to this Information Request.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael E. Hans".

Michael E. Hans, Acting Chief  
Superfund Enforcement & Compliance Assurance Branch

A handwritten signature in black ink, appearing to read "Tinka G. Hyde".  
*Dean Mason for T.H.*

Tinka G. Hyde  
Director, Water Division  
U.S. Environmental Protection Agency, Region 5

Enclosures

bcc: Sheila McAnaney, ORC (C-14J)

**James Justice**, (G-41)

Carol Ropski, ESS 1(SE-5J)

**Arlene Lilly**, ESS 1 (SE-5J)

Records Center (SRC-7J)

Enclosure A  
Information Request  
Statoil Eisenbarth Well Response Site

**INSTRUCTIONS**

1. Answer Each Question Completely. You must provide a separate answer to each question and subpart set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject you to the penalties set out in the cover letter.
2. Response Format and Copies. Provide the responses to this Information Request and copies of all requested documents either electronically or on paper (hard copy). Your submission, whether electronic or hard copy, must include an index that lists all the responsive documents provided, and that indicates where each document is referenced in the written response, and to which question or questions each document is responsive.

Any documents you determine to be Confidential Business Information (CBI) must be segregated out and submitted in a separate folder or on a separate CD. These documents must be clearly marked as "Confidential Business Information".

If providing your response electronically, it must be submitted on a compact disc in Portable Document Format (PDF) and comply with the following requirements:

- a. CBI and personal privacy information (PII) should be provided on separate media (e.g., a separate CD) and marked as such to ensure information is appropriately handled.
  - b. All documents originally smaller than 11 by 17 inches can be submitted electronically; any documents originally larger than 11 by 17 inches must be submitted in hard copy.
  - c. Electronic PDF files cannot be submitted in Adobe Acrobat versions above 6 (or above PDF format version 1.5 if not using Adobe).
  - d. Electronic PDF files must be text-searchable.
  - e. The document index must clearly identify any single electronic document which has been separated into multiple electronic files (because of size limitation or otherwise) and each component file that comprises the full document.
3. Number Each Answer. Number each answer with the number of the question to which it corresponds.
  4. Provide the Best Information Available. You must provide responses to the best of your ability, even if the information sought was never put down in writing or if the written documents

are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered noncompliance with this Information Request.

5. Identify Information Sources. For each question, identify all persons and documents you relied on for your answer.

6. Confidential Information. You must provide the information requested even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as “trade secret” or “proprietary” or “company confidential.” Your confidentiality claim should be supported by the submission of information consistent with 40 C.F.R. Part 2. Information covered by a confidentiality claim will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. **If no such claim accompanies the information received by EPA, it may be made available to the public by EPA without further notice to you.**

You should also provide a redacted version of the same document that removes all CBI and Personal Privacy Information (PII) from the document. This redacted version of the document should remove all information that you claim is CBI or PII. Since all the CBI and PII is removed, this redacted version is not subject to the procedures of 40 C.F.R. Part 2. EPA may make this redacted version available to the public without further notice to you.

7. Disclosure to EPA Contractor. Information that you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. § 2.310(h), even if you assert that all or part of it is confidential business information. EPA may provide this information to its contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information that you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within 14 days of receiving this Information Request.

8. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from your responses, included on separate sheet(s), and marked as “Personal Privacy Information”. You should note, however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you.

9. Objections. While you may object to certain questions in this Information Request, you must provide responsive information notwithstanding those objections. To object without providing responsive information may subject you to the penalties set out in the cover letter.

10. Privilege. If you claim that any document responsive to this Information Request is a communication for which you assert that a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege. For any document for which you assert that a privilege exists for a portion of it, provide the portion of the document for which you are not asserting a privilege, identify the portion of the document for which you are asserting the privilege, and provide the basis for such an assertion. **Please note that regardless of the assertion of any privilege, any facts contained in the document that are responsive to the Information Request must be disclosed in your response.**

11. Declaration. You must complete the enclosed declaration, in hard copy with an original signature, certifying the accuracy of all statements in your response.

## DEFINITIONS

All terms not defined here shall have their ordinary meaning, unless such terms are defined in Section 101 of CERCLA, 42 U.S.C. § 9601, or Volume 40 of the Code of Federal Regulations, in which case such statutory or regulatory definitions shall apply.

The following definitions apply to the following words as they appear in this Information Request:

1. The term “you” or “Respondent” means Halliburton Energy Services, Inc., together with its agents, employees, subsidiaries, and contractors.
2. The term “business activities” means all actions, endeavors, ventures, or financing arrangements related in any manner whatsoever to the use and development of the Site, including surveying, sampling, grading, documentation, photography, demolition, construction, and waste disposal, and sales.
3. The terms “describe” and “submit” shall mean turning over to EPA either original or duplicate copies of the requested information in the possession, custody, or control of Halliburton Energy Services, Inc. Where specific information has not been memorialized in any document but is nonetheless responsive to an information request, you must respond to the request with a written response. If such requested information is not in your possession, custody, or control, indicate where such information or documents may be obtained if known.
4. The term “discharge” shall have the same definition as that contained in Section 311(a)(2) of CWA, 33 U.S.C. § 1321(a)(2), which includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying or dumping.
5. The term “document” and “documents” means any method of recording, storing, or transmitting information, including information in electronic form (e.g. emails). “Document” includes, but is not limited to:
  - a. writings of any kind, formal or informal, including, but not limited to, any of the following:
    - i. letters, memoranda, fax transmittals;
    - ii. meeting minutes, telephone records, notebooks;



- iii. agreements and contracts;
  - iv. reports to shareholders, management, or government agencies;
  - v. transportation manifests;
  - vi. copies of any document.
- b. any film, photograph, or sound recording on any type of device;
  - c. any blueprints or drawings;
  - d. attachments to, or enclosures with, any document.
6. The term "environment" includes air, water, land, and the interrelationships which exist among and between air, water, and land and all living things.
  7. The term "extremely hazardous chemical" means a chemical on the list contained in Section 302(a)(2) of the Emergency Planning and Community Right-to-Know Act (EPCRA).
  8. The term "facility" means all buildings, equipment, structures, and other stationary items which are located on a single or on contiguous or adjacent sites and which are owned or operated by the same person (or by a person who controls, is controlled by, or is under common control with such person).
  9. The term "hazardous chemical" shall have the same definition as that contained in 29 C.F.R. § 1910.1200(c), except that such term does not include the following:
    - a. Any food, food additive, color additive, drug, or cosmetic regulated by the Food and Drug Administration.
    - b. Any chemical present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use.
    - c. Any chemical to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and use by the general public.
    - d. Any chemical to the extent it is used in a research laboratory or hospital or other medical facility under the direct supervision of a technically qualified individual.
    - e. Any chemical to the extent it is used in routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer.

10. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
11. The term "identify" means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; and (c) present or last known employer (include full name and address), and (d) the job title and a description of the job responsibilities of such person.
12. The term "identify" means, with respect to a corporation, partnership, business trust, or other entity, to set forth: (a) its full name; (b) complete street address; (c) legal form (e.g., corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.
13. The term "identify" means, with respect to a document, to provide: (a) its customary business description (e.g., letter, invoice); (b) its date; (c) its number if any (e.g., invoice or purchase order number); (d) the identity of the author, addressee, and/or recipient; and (e) a summary of the substance or the subject matter. **Alternatively, Respondent may provide a complete copy of the document.**
14. The term "material" or "materials" means any and all raw materials, used oil, commercial products, wastes, chemicals, substances, or matter of any kind.
15. The terms "material safety data sheet" and "MSDS" means the sheet required to be developed under the regulation at 29 C.F.R. § 1910.1200(g).
16. The term "oil" shall have the same definition as that contained in Section 311(a)(1) of the CWA, 33 U.S.C. § 1321(a)(1).
17. The term "oil facility" shall mean oil production, storage, or transportation equipment including, but not limited to, pipelines, tanks, 55-gallon drums, storage totes, and refining units.
18. The term "person" means any natural person, firm, contractor, corporation, partnership, trust, or governmental entity, unless the context indicates otherwise.
19. The term "petroleum" means crude oil, condensate, natural gasoline, natural gas liquids and liquefied petroleum gas.
20. The term "petroleum product" means flammable, toxic, or corrosive products obtained from distilling and processing of crude oil, unfinished oils, natural gas liquids, blend stocks, and other miscellaneous hydrocarbon compounds.

21. The term "pipeline" or "pipeline system" means all parts of a pipeline facility through which oil or petroleum products moves in transportation, including, but not limited to line pipe, valves, and other appurtenances connected to line pipe, pumping units, fabricated assemblies associated with pumping units, metering and delivery systems and fabricated assemblies therein, and breakout tanks.
22. The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound or mixture, including disease-causing agents, which after release into the environment will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations.
23. The term "production facility" means piping or equipment used in the production, extraction, recovery, lifting, stabilization, separation, or treating of oil, or associated storage or measurement.
24. The term "property" means any interest in real or personal property whatsoever, including fee interests, leases, licenses, rental, and mineral rights.
25. The term "release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance, hazardous chemical, extremely hazardous chemical, toxic chemical, or pollutant or contaminant.
26. The "Site," for the purposes of this information request, means any or all property or area described as: the Eisenbarth Well Pad, located at 42240 Long Ridge Road, Clarington, Ohio.
27. The term "toxic chemical" means a chemical on the list described in Section 313(c) of EPCRA.
28. The terms "transport" or "transportation" mean, with respect to oil, the movement of petroleum, petroleum products, or oil and loading, unloading, or storage incidental to that movement.
29. The terms "transport" or "transportation" mean, with respect to hazardous chemicals, the movement of a hazardous chemical by any mode, including pipeline, and in the case of a hazardous chemical which has been accepted for transportation by a common or contract carrier, the terms "hazardous chemical transport" or "hazardous chemical transportation" shall include any stoppage in transit which is temporary, incidental to the transportation movement, and at the ordinary operating convenience of a common or contract carrier, and any such stoppage shall be considered as continuity of movement and not as the

storage of a hazardous chemical.

30. The term "waste" or "wastes" includes, but is not limited to, trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge.

## DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct.

Executed on \_\_\_\_\_, 2014.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Type or Print Name

\_\_\_\_\_  
Title

Enclosure B  
Requests

1. Identify all persons consulted in the preparation of the answers to these Information Requests.
2. Identify all documents consulted, examined or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.
3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.
4. List the EPA Identification Numbers of the Respondent.
5. List the Standard Industrial Classification Code of the Respondent.
6. Provide the number of employees employed by Respondent.
7. If Respondent was a subsidiary or division of a corporation at any time from January 1, 2011 to the present, identify the corporation (parent corporation if a subsidiary), and provide copies of pertinent documents supporting the relevant relationship.
8. State the dates during which you owned, operated or leased the Site and provide copies of all documents evidencing or relating to such ownership, operation or lease arrangement (e.g., deeds, leases, etc.).
9. If portions of the Site are owned by entities other than you, identify those entities and what portion of the Site they own.
10. Identify the current operators, including lessors, of the Site. For each such operator, further identify:
  - a. The dates of operation;
  - b. The nature of its operations at the Site;
  - c. The portion of the Site it operates; and
  - d. All evidence that they controlled access to the Site.
11. Provide copies of all local, state and federal environmental permit applications and permits ever granted for the Site or any part thereof (e.g., RCRA permits, National

Pollutant Discharge Elimination System permits, CWA Section 401 Water Quality Certification, CWA Section 404 Permits, and/or Underground Injection Control permits, etc.). If the facility applied for a "no discharge" or other permit exemption under such permits, please provide a copy of such application.

12. Provide all reports, information or data related to soil, water (ground and surface) or air quality and geology/hydrogeology at and about the Site. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.
13. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances by you, your contractors or by prior owners and/or operators at the Site.
14. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances, materials, pollutants or contaminants, oil, petroleum, or petroleum products (for this question "material") at the Site? If the answer to the preceding question is anything but an unqualified "no", identify for each material:
  - a. The chemical composition, characteristics (including toxicity), physical state (e.g., solid, liquid);
  - b. The supplier;
  - c. How it was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
  - d. When it was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
  - e. Where it was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
  - f. The quantity that was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
15. Did the Site ever have "interim status" under RCRA? If so, and the Site does not currently have interim status, describe the circumstances under which the Site lost interim status.
16. Did you ever file a notification of hazardous waste activity under RCRA for the Site? If so, provide a copy of such notification.
17. Was Respondent conducting business at the Site during the time period of January 1, 2011 to December 31, 2011? If so, please respond to the following information requests.

- a. Did you use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2011 to December 31, 2011?
- b. If the answer to 17(a) is yes, provide a list of such hazardous chemicals and the maximum quantity stored at the facility at any one given time during the period of January 1, 2011 to December 31, 2011.
- c. For each hazardous chemical listed in 17(b), provide a Material Safety Data Sheet (MSDS).
- d. Provide a copy of the Tier One or Tier Two form required under Section 312 of the Emergency Planning and Community Right-to-Know Act, 42 U.S.C. § 11022, for the period of January 1, 2011 to December 31, 2011.
- e. Did you supply copies of all MSDSs, or a list of hazardous chemicals, for hazardous chemicals stored at this facility above a Threshold Planning Quantity (TPQ) and/or Minimum Threshold Quantity to the Ohio State Emergency Response Commission ("Ohio SERC") on or before October 17, 1987, or 90 days from the date the hazardous chemical became present at this facility? If so, provide documentation to support your claim.
- f. Did you supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Ohio SERC for the period of January 1, 2011 to December 31, 2011, on or before March 1, 2012? If so, provide documentation to support your claim.
- g. Did you supply copies of all MSDSs, or a list of hazardous chemicals, for hazardous chemicals stored at this facility above a Threshold Planning Quantity (TPQ) and/or Minimum Threshold Quantity to the Monroe County Local Emergency Planning Committee (Monroe County LEPC) on or before October 17, 1987, or 90 days from the date the hazardous chemical became present at this facility? If so, provide documentation to support your claim.
- h. Did you supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Monroe County LEPC for the period of January 1, 2011 to December 31, 2011, on or before March 1, 2012? If so, provide documentation to support your claim.
- i. Did you supply copies of all MSDSs, or a list of hazardous chemicals, for hazardous chemicals stored at this facility above a Threshold Planning Quantity (TPQ) and/or Minimum Threshold Quantity to the Clarrington Fire Department on or before October 17, 1987, or 90 days from the date the hazardous chemical



became present at this facility? If so, provide documentation to support your claim.

- j. Did you supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Clarington Fire Department for the period of January 1, 2011 to December 31, 2011, on or before March 1, 2012? If so, provide documentation to support your claim.

18. Was Respondent conducting business at the Site during the time period of January 1, 2012 to December 31, 2012? If so, please respond to the following information requests.

- a. Did you use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2012 to December 31, 2012?
- b. If the answer to subparagraph (a) is yes, provide a list of such hazardous chemicals and the maximum quantity stored at the facility at any one given time during the period of January 1, 2012 to December 31, 2012.
- c. For each hazardous chemical listed in subparagraph (b), provide a Material Safety Data Sheet (MSDS). If you already provided an MSDS for a hazardous chemical in response to Question 17, you need not provide another one for the same hazardous chemical.
- d. Provide a copy of the Tier One or Tier Two form required under Section 312 of the Emergency Planning and Community Right-to-Know Act, 42 U.S.C. § 11022, for the period of January 1, 2012 to December 31, 2012.
- e. Did you supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Ohio SERC for the period of January 1, 2012 to December 31, 2012, on or before March 1, 2013? If so, provide documentation to support your claim.
- f. Did you supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Monroe County LEPC for the period of January 1, 2012 to December 31, 2012, on or before March 1, 2013? If so, provide documentation to support your claim.
- g. Did you supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Clarington Fire Department for the period of January 1, 2012 to December 31, 2012, on or before March 1, 2013? If so, provide documentation to support your claim.

19. Was Respondent conducting business at the Site during the time period of January 1, 2013 to December 31, 2013? If so, please respond to the following information requests.

- a. Did you use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2013 to December 31, 2013?
  - b. If the answer to subparagraph (a) is yes, provide a list of such hazardous chemicals and the maximum quantity stored at the facility at any one given time during the period of January 1, 2013 to December 31, 2013.
  - c. For each hazardous chemical listed in subparagraph (b), provide a Material Safety Data Sheet (MSDS). If you already provided an MSDS for a hazardous chemical in response to Question 17, you need not provide another one for the same hazardous chemical.
  - d. Provide a copy of the Tier One or Tier Two form required under Section 312 of the Emergency Planning and Community Right-to-Know Act, 42 U.S.C. § 11022, for the period of January 1, 2013 to December 31, 2013.
  - e. Did you supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Ohio SERC for the period of January 1, 2013 to December 31, 2013, on or before March 1, 2014? If so, provide documentation to support your claim.
  - f. Did you supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Monroe County LEPC for the period of January 1, 2013 to December 31, 2013, on or before March 1, 2014? If so, provide documentation to support your claim.
  - g. Did you supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Clarington Fire Department for the period of January 1, 2013 to December 31, 2013, on or before March 1, 2013? If so, provide documentation to support your claim.
20. For the five years prior to this Information Request, did the Site have more than a total of 1,320 gallons of oil stored in tanks, bunkers, drums, totes, transformers, pails, or other storage containers that are not buried?
  21. Identify the total oil storage capacity of the Site in gallons. If this has changed since operations began at the Site, explain how and when.
  22. Provide a list of oil storage containers and the maximum storage capacity of each oil storage container at the Site for five years prior to June 28, 2014.

23. Did the Site have a Spill Prevention, Control and Countermeasures Plan as required by the regulation at 40 C.F.R. § 112.3? If so, submit a copy of the plan, including the certification by a Professional Engineer as required by the regulation at 40 C.F.R. § 112.3(d), documentation of full approval of the plan by management as required by the regulation at 40 C.F.R. § 112.7, and a description of any amendments to the plan made pursuant to the regulation at 40 C.F.R. § 112.4.
24. If the answer to the preceding question is yes, identify when the Site first implemented a Spill Prevention, Control and Countermeasures Plan.
25. Submit copies of any reports of spills required to be reported by Ohio Revised Code 3745.50 for the past 5 years.
26. Provide a copy of the emergency plan that outlines the procedures for notification of accidental releases at the Site.
27. How many employees are employed by Respondent at the Eisenbarth Well Pad in Clarington, Ohio?
28. Provide documentation regarding the training of employees at the Site on the procedures for notification of accidental releases at the Site.
29. Describe the status of all wells on the Site other than Well #7H, including the casings inside them and any other measures taken to seal those wells.
30. Describe the operations at the Site generally and specifically the operations taking place in the ten days prior to and including June 28, 2014. Include the following information in your description:
  - a. The identity of the shale that was being hydraulically fractured at Well #7H (e.g. Utica, Marcellus);
  - b. The depth of the vertical well at Well #7H at 9:00am EDT on June, 28, 2014;
  - c. The number of horizontal arms planned for Well #7H;
  - d. The number of horizontal arms completed at Well #7H at 9:00 am EDT on June 28, 2014;
  - e. Please specify the stage of the process for each of the horizontal well arms identified in c. and d. above; and
  - f. The disposal or planned disposal of the hydraulic fracturing fluid after its use.

31. Please provide a list of all drinking water wells within 2.5 miles of any of the horizontal arms identified in Question 30(c) above. Please provide copies of any sampling and analyses conducted at the drinking water wells or other drinking water intakes that Halliburton conducted prior to construction of the wells to after the June 28, 2014 incident.
32. Describe the blender operations at the Site. Submit any standard operating procedures and manufacturer recommendations or specifications for those operations.
33. Describe any preventative maintenance that was performed on the blenders prior to operation, including lubricating oil use logs. Submit any manufacturer recommendations or specifications for maintenance of the blenders.
34. Submit training records or training certification for personnel operating the blenders on June 28, 2014.
35. Describe the water life cycle of the fracturing process. The water "lifecycle" includes obtaining and transporting the water to the Site, followed by its storage and use in the hydraulic stimulation process during the completions phase of a well. Please include:
  - a. A list of all additives to the fracturing fluid before injection;
  - b. A description of any sampling of the fluid prior to injection;
  - c. A description of any sampling of flowback fracturing fluid conducted post injection;
  - d. A description of all waste disposal methods for flowback fracturing fluid stored onsite (for example: trucked to a pre-treatment facility, disposed of at underground injection well, treated and reused at future sites, etc.); and
  - e. A list of sites that accept the flowback fracturing fluid waste for treatment or disposal, if used.
36. Identify the amount of hydraulic fracturing fluid that had been pumped down Well #7H as of 9:00 am EDT on June 28, 2014.
37. Identify the total amount of each component of the fluid pumped down Well #7H as of 9:00 am EDT on June 28, 2014. Provide any analytics or sampling results of this fluid if it is available.

38. Describe how BE-9 is used on the Site. Identify the frequency with which BE-9 is used in the hydraulic fracturing process and the concentration in which it is used in the mixed hydraulic fracturing fluids.
39. Submit a diagram of the Site on the morning of June 28, 2014 showing the location of all storage containers for oil, hazardous substances, hazardous chemicals, extremely hazardous chemicals, and materials, including containers stored in van trailers.
40. Submit a list of the amounts of oil, hazardous substances, hazardous chemicals, extremely hazardous chemicals, and materials stored on the Site on the morning of June 28, 2014 and how much of each listed item was recovered after response activities to the fire finished on or about July 1. Indicate where each listed item was stored by linking the list to the diagram submitted pursuant to Question #39. Submit an MSDS for each material listed and product labels listing all ingredients of each material listed.
41. Identify and describe in detail the series of events that caused the fire and subsequent explosions at the Site on June 28, 2014. Identify all persons, including contractors, with information about the cause of the fire. Submit any "root cause" analyses or any report that details the cause of the fire at the Site that began on June 28, 2014.
42. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants or contaminants, or oil from the Site on June 28, 2014 and damages resulting therefrom.
43. Describe in detail the series of events that caused fluid that had been pumped into Well #7H to flow back up the well and onto the Site uncontained on and after June 28, 2014.
44. If there were any sensors in Well #7H on June 28, 2014, identify the sensors, their placement in the well, and provide any data received from those sensors during the hydraulic fracturing operations on Well #7H both prior to and after the incident on June 28, 2014.
45. Provide any sampling data or analysis that was performed on the hydraulic fracturing fluid that spilled out of Well #7H and onto the Site on and after 9:00 am EDT on June 28, 2014.
46. Estimate the amount of fluid that had been pumped into Well #7H that flowed back up the well and onto the well pad on and after June 28, 2014. Submit all calculations and assumptions underlying the estimate.
47. To the best of your knowledge, estimate the duration of the release or discharge of fluids from the Site. Explain how you determined the onset and mitigation of the release or discharge and what documents or information you relied on to make your determination.

48. Submit a detailed map depicting all of the areas impacted by the incident at the Site that began on June 28, 2014. Show the extent of all discharges and releases, location of recovery equipment, access routes and response staging areas, areas that were evacuated and roads that were closed (if applicable), and all other pertinent details. Include identified migration pathways from the Site to the unnamed tributary of Opossum Creek.
49. Submit copies of calculations showing the amount of oil discharged, the amount recovered during the cleanup, the amount lost to evaporation, the amount degraded into the environment, and the amount that may still be present in the environment.
50. Describe the composition of any oil released on or after June 28, 2014 including any additives.
51. For each material, including pollutants or contaminants, hazardous substances, oil, petroleum, and petroleum products, that was released or discharged as a result of the incident at the Site that began on June 28, 2014, provide the following information. Describe your method or source of information and provide the calculations supporting the estimate provided.
  - a. The amount released or discharged to the environment from the Site;
  - b. The amount released or migrated onto and/or into the soil and/or the subsurface strata;
  - c. The amount discharged into a sanitary sewer system. If any, describe the pre-treatment conducted by your facility;
  - d. The amount discharged into a storm sewer;
  - e. The amount discharged into the Site drainage system;
  - f. The amount discharged into the unnamed tributary of Opossum Creek located approximately one and a half miles from the Site;
  - g. The amount discharged or released to any other surface and a description of those surfaces;
  - h. The amount that volatilized;
  - i. The amount degraded into the environment; and
  - j. The amount remaining in the environment.

52. For the purposes of this question, the term "pollutant" shall have the same definition as that contained in Section 504 of the Clean Water Act. For any pollutant that was released or discharged as a result of the incident at the Site that began on June 28, 2014, provide the following information. Describe your method or source of information and provide the calculations supporting the estimate provided. If the information has already been provided in response to Question #51, indicate the name of the pollutant and that the information was already provided.
- a. The amount released or discharged to the environment from the Site;
  - b. The amount released or migrated onto and/or into the soil and/or the subsurface strata;
  - c. The amount discharged into a sanitary sewer system;
  - d. The amount discharged into a storm sewer;
  - e. The amount discharged into the Site drainage system;
  - f. The amount discharged into the unnamed tributary of Opossum Creek located approximately one and a half miles from the Site; and
  - g. The amount discharged or released to any other surface and a description of those surfaces.
53. Did any hazardous substance react with any substance to cause a by-product? If so, explain and provide the calculations to show the reaction and quantity of each by-product released.
54. Submit copies of all reports and analytical results related to the monitoring or sampling of the areas impacted by the incident at the Site that began on June 28, 2014. Do not include reports and data already submitted in response to other response items in this Information Request.
55. Submit copies of all photographs and video related to the fire and subsequent response efforts on and after June 28, 2014 at the Site.
56. Describe in detail the actions taken by your employees and/or anyone else regarding the emergency response to the fire and release, including any and all chemicals used, the handling or clean-up of the materials, oil, hazardous substances, and hazardous chemicals released, including transportation and disposal.
57. Provide copies of any RCRA hazardous waste manifests for hazardous wastes removed from the Site after June 28, 2014.

58. Identify the party that established the water curtain used to protect a trailer containing compressed gas cylinders and the source of the water utilized to establish the water curtain. If the water was not fresh water, describe its composition.
59. If any fluids and substances were released to a containment area, please respond to the following information requests:
- a. What is the containment area made of?
  - b. What are the dimensions of the containment area?
  - c. Did the containment area contain a neutralization agent? If so, what and how much of the neutralization agent was present?
60. What secondary containment, if any, was in place at the Site on June 28, 2014? If that secondary containment failed to work properly, then identify why the secondary containment failed to work properly.
61. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology or air quality on or about the Site? If so, identify:
- a. What the nature and scope of these investigations will be;
  - b. The contractors or other persons that will undertake these investigations;
  - c. The purpose of the investigations;
  - d. The dates when such investigations will take place and be completed; and
  - e. Where on the Site such investigations will take place.
62. Provide copies of all investigative documents prepared by you, your agents, or your contractors with respect to the incidents of June 28, 2014 through now at the Site. If these have already been provided in response to another Information Request, indicate the question number.
63. Submit copies of all correspondence with the Ohio Department of Natural Resources (ODNR), Ohio Environmental Protection Agency (OEPA), local officials, your insurers, and the United States Fish and Wildlife Service that involve the incident at the Site, the response at the Site, and any other incident-related event from June 28, 2014 through the present.